

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRISON COMPANY LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 3:19-CV-1057-B
	§	
A-Z WHOLESALERS INC. and	§	
BARKAT G. ALI,	§	
	§	
Defendants.	§	

PLAINTIFF’S REQUESTED VOIR DIRE QUESTIONS

Plaintiff Harrison Company LLC (the “Harrison”) respectfully submits the following Requested Voir Dire Questions pursuant to the Court’s Scheduling Order (Doc. #9):

Knowledge of Parties, Witnesses, Counsel

1. Have you heard of Barkat G. Ali? (if so, when did you first hear about him and what do you recall?)
2. Have you heard of A-Z Wholesalers? (if so, what have you heard / what do you know?)
3. Have you heard of Amar Ali? (if so, what have you heard / what do you know?)
4. Have you heard of attorney Joyce Lindauer or her law firm? (if so, what have you heard / what do you know?)
5. Have you heard of attorney Guy Holman (if so, what have you heard / what do you know?)
6. Have you heard of Harrison Company LLC? (if so, what have you heard / what do you know?)
7. Have you heard of Imperial Trading Co.? (if so, what have you heard / what do you know?)
8. Do you have a strong feelings or prejudice against big companies that would make it difficult for you to be unbiased in a lawsuit? (if so, please explain)
9. Do you have a strong feelings or prejudice against Louisiana businesses or Louisiana residents that would make it difficult for you to be unbiased in a lawsuit? (if so, please explain)
10. Do you think that a big company ought to have to prove its case by even more than the law requires (for example, because it has more resources)?
11. Have you heard of the law firm Locke Lord L.L.P? (if so, what have you heard / what do you know?)

Personal Experiences

12. Do you have a college degree or any professional training in finance or accounting? (if so, please explain)
13. Have you or a close family member ever worked for a supplier or wholesaler?
14. Have you or a close family member ever worked in the beverage industry?
15. Have you or a close family member ever worked in the tobacco industry (e.g. buying or selling cigarettes)?
16. Have you or a close family member ever worked at or owned a convenience store?
17. Have you ever worked as an accountant, for an accounting firm, or in an accounting department?
18. Have you ever been responsible for balancing or managing a business's books and records?
19. Have you or a close family member ever worked as a truck driver?
20. Have you or a close family member ever worked in sales (e.g., selling goods or services on behalf of an employer)?
21. Have you ever purchased goods on credit?
22. Have you ever completed or submitted a credit application? (if so, for what?)
23. Have you ever been issued a new credit card number for an existing account? (if so, what happened to any existing balance? Explain)
24. Have you or a close family member ever filed for bankruptcy?
25. Have you or a close family member ever signed a personal guaranty (e.g., guaranteeing a debt for another person or entity)?
26. Have you or a close family member ever been involved in a dispute regarding a debt—either attempting to collect a debt, or allegedly failing to pay a debt? (if so, please explain)
27. Have you ever not been paid for work performed, services rendered, or goods sold under a contract or otherwise? (if so, please explain)
28. Have you ever worked for a company that was acquired by or sold to new owners?
29. Have you ever worked for, or held titles with, multiple business or companies at the same time? (if so, please explain)
30. Would you fault someone for using a single brand when operating two related business? (if so, please explain)
31. Is it unusual to see a Walmart truck in a Sam's Club parking lot? Why/ why not?
32. Do you assume that the name on an invoice or receipt is always the entity you are paying money to? (e.g., if you go to Tom Thumb, do you know if you're really doing business with Albertson's, Safeway, Randall's or Tom Thumb? Do you know where that money ultimately goes? Do you care? Why/why not?)
33. Do you feel that an entity or individual should honor its, his, or her contract?
34. If you had a contract with a husband, individually, to pay him weekly, and after several years, his wife started sending invoices, and you started making checks payable to his wife (instead of him), in your opinion, would that mean that the contract with the husband went away? Or that you no longer owed the husband money under the contract? (explain)
35. Have you or a close family member ever been a party to a lawsuit? (if so, please briefly describe the subject matter of the lawsuit)
36. Do you have any hard feelings toward the court system or the judicial process in general? (if so, please explain)
37. Have you ever served on a jury before? (if so, what type of case?)
38. Have you or a close family member ever resided in or done business in Louisiana?

Respectfully submitted,



David L. Swanson

State Bar No. 19554525

dswanson@lockelord.com

Joseph A. Unis, Jr.

State Bar No. 24075625

junis@lockelord.com

Anna K. Finger

State Bar No. 24105860

anna.k.finger@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2800

Dallas, Texas 75201-6776

T: 214-740-8000

F: 214-740-8800

**ATTORNEYS FOR PLAINTIFF
HARRISON COMPANY, L.L.C.**

CERTIFICATE OF SERVICE

I certify that on January 18, 2021, I served this document on all counsel of record via the ECF system and/or email.

